

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹
Debtors.

Chapter 11

Case No. 22-11068 (KBO)

(Jointly Administered)

**VERIFIED STATEMENT OF GELLERT SEITZ BUSENKELL & BROWN LLC AND
MORGAN & MORGAN, P.A. PURSUANT TO BANKRUPTCY RULE 2019**

Gellert Seitz Busenkell & Brown LLC (“GSBB”) and Morgan & Morgan, P.A. (“M&M” and collectively with GSBB, “Counsel”), counsel to those individuals identified on Exhibit A (collectively, the “M&M FTX Customers” or “M&M Group of FTX Clients”) annexed hereto, submit this verified statement (the “Verified Statement”) pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure (“Rule 2019”) and respectfully state as follows:²

1. Each M&M FTX Customer has individually retained Morgan & Morgan to represent him or her as counsel in connection with claims asserted in the above-captioned chapter 11 cases (the “Chapter 11 Cases”), and in connection with that certain adversary proceeding pending in the Chapter 11 Cases, captioned *In re: FTX Trading Ltd., et al.*, Adv. Pro. No. 25-50962-KBO (the “M&M Adversary Proceeding”³).

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063, respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

² Counsel does not represent the M&M FTX Customers as a “committee” or a “group” (as such terms are used in the Bankruptcy Code and the Bankruptcy Rules) and maintains that Rule 2019 is not applicable to the M&M FTX Customers. However, at the request of the above-captioned debtors (collectively, the “Debtors”), and out of an abundance of caution, Counsel submits this Verified Statement.

³ The M&M Adversary Proceeding, filed on May 29, 2025, has not yet been served on FTX, as it is Counsels’ intention to amend said complaint prior to effectuating service upon FTX, accordingly.

2. For purposes of the Chapter 11 Cases and the M&M Adversary Proceeding, Counsel represent each M&M FTX Customer in their individual capacity.

3. The name of each M&M FTX Customer, as of the date of this Verified Statement, together with the disclosable economic interests held by each of them in relation to the Chapter 11 Cases, is set forth in Exhibit A annexed hereto. Counsel will provide under seal the home address for each M&M FTX Customer to (1) the Court and the United States Trustee upon request and (2) to counsel to the Debtors and counsel to the Official Committee of Unsecured Creditors upon request and subject to appropriate confidentiality protections or protective orders.

4. The information set forth on Exhibit A is based upon information provided to undersigned counsel by the M&M FTX Customers and is intended only to comply with Rule 2019 and is not intended for any other purpose.

5. Nothing contained in this Verified Statement is intended or shall be construed to constitute: (i) a waiver or release of the rights of any of the M&M FTX Customers to have any final order entered by, or other exercise of the judicial power of the United States performed by, an Article III court; (ii) a waiver or release of the rights of any of the M&M FTX Customers to have any and all final orders in any and all non-core matters entered only after *de novo* review by a United States District Judge; (iii) consent to the jurisdiction of the Bankruptcy Court over any matter; (iv) an election of remedy; (v) a waiver or release of any rights any of the M&M FTX Customers may have to a jury trial; (vi) a waiver or release of the right to move to withdraw the reference with respect to any matter or proceeding that may be (or may have been) commenced in these Chapter 11 Cases against or otherwise involving any of the M&M FTX Customers; or (vii) a waiver or release of any other rights, claims, actions, defenses, setoffs, or recoupments to which any of the M&M FTX Customers are or may be entitled, in law or in equity, under any agreement

or otherwise, with all such rights, claims, actions, defenses, setoffs, or recoupments being expressly reserved.

6. Counsel reserves the right to amend or supplement this Verified Statement in accordance with the requirements set forth in Rule 2019 at any time in the future.

7. The undersigned verify that the foregoing is true and correct to the best of their knowledge.

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Dated: July 29, 2025

GELLERT SEITZ BUSENKELL & BROWN, LLC

/s/ Michael Busenkell

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Margaret F. Manning (No. 4183)
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By: /s/ Amir Isaiah

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Orlando, FL 32801
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Counsel to the M&M FTX Customers

EXHIBIT A

<u>M&M FTX CUSTOMERS</u>	CUSTOMER ENTITLEMENT AMOUNT¹
Akmyradov, Chary	\$2,028
Alam, Mashood	\$7,332.85
Albaine, Jean	\$10,000.00
Alberti, Victor	\$25,000.00
Alhassan, Samer	\$175,000.00
Alonso, Manuel	\$25,000.00
Angelini, Anthony	\$140,000.00
Anderson, Michael	\$25,000.00
Aper, Rusty	\$15,000.00
Apiou, Josias	\$604.15
Apolo, Jonah	\$100,000.00
Applegate, Benjamin	\$1,427.23
Aquino-Quiroz, Enrique	\$91,835.63
Arazmo, Dominic	\$8,320.66
Arevalos, Robert	\$25,000.00
Aurelien, Junist	\$6,700.00
Avila, Enrique	\$100,000.00
Ayadi, Haithem	\$50,000.00
Ayala, Carlos	\$25,000.00
Ayers, Jacob	\$1,762.52
Bailey, Raynard	\$25,000.00
Bakx, Cody	\$4,508.61
Ball, Brett	\$25,000.00
Joseph, Barthley	\$100,000.00
Bartley, Landon	\$15,000.00
Belsterling, William	\$25,000.00
Benegas, Marcos	\$1,426.53
Benitez, Orlando	\$25,000.00
Bent, Blake	\$4,541.44
Bernstein, Joey	\$25,000.00
Berry, Andrew	\$3,123.49
Betti, Gregory	\$500,000.00
Bhatt, Nimish	\$25,000.00

¹ The Consumer Entitlement Amount is calculated based on the amount reported to Morgan & Morgan by Morgan & Morgan FTX Customers.

Blalock, Charles Glenn	\$5,000.00
Bohn Candido da Silva, Teodoro	\$2,111.57
Bonilla Alexander, Douglas	\$9,000.00
Bracey, Dante	\$25,000.00
Brown, David	\$4,762.00
Brown, Lewis	\$22,146.30
Brown, Tyler	\$25,000.00
Brown, William Timothy	\$25,000.00
Buckley, Michael	\$463,000.00
Burgess, Craig	\$10,082.79
Butrus, Michael	\$100,000.00
Cagliergin, Saadet	\$30,400.15
Caravella, Nicholas	\$25,000.00
Chanes, Steven	\$25,000.00
Chaojaroenpong, Nutthachai	\$25,000.00
Chawla, Karan	\$500,000.00
Chen, Yee	\$1,635.04
Chern, John	\$25,000.00
Chumoviskiy, Dmitry	\$25,000.00
Cirillo, Matthew	\$28,947.28
Clark, John	\$2,266.48
Cobb, Bennie	\$25,000.00
Cohen, Jonathan	\$1,000.00
Cohen, Mendel	\$25,000.00
Cole, Cornelius	\$25,000.00
Collado, Christopher	\$303.46
Columnas, Kevin	\$5,000.00
Connolly, Ryan	\$16,875.00
Craig, Andre	\$465,795.00
Dale, Arsenio	\$25,000.00
Daniel, Gregg	\$2,500.00
Daniel, Horace	\$25,000.00
Deal, Colton J.	\$5,000.00
De La Cruz, Juan	\$25,000.00
DeAngelis, Scott	\$25,000.00
DeBonis, Matthew	\$7,870.74
Delcore, Joseph	\$25,000.00
Delgado, Leonard	\$9,604.37
Diallo, Souleymane	\$13,000.00
Dickinson, Joseph	\$25,000.00

Dixit, Shashank	\$25,000.00
Djelili, Ramazan	\$653.15
Duque, Cameron	\$25,000.00
Eccleston, Julian	\$25,000.00
Ekanem, Emmanuel	\$3,505.00
Elkins, Samuel Christopher	\$12,342.82
Estrella, Jose	\$25,000.00
Fair, Scott	\$25,000.00
Fanning, Alex	\$2,000.00
Ferrante, Gianni	\$25,000.00
Ferrari, Manolo de	\$16,846.70
Forbes, Damian	\$500,000.00
Franklin, Stephen	\$25,000.00
Franks, Cody	\$5,000.00
Franta, Phillip	\$14,000.00
Freeland, Jared	\$25,000.00
Freireich, Samuel	\$25,000.00
Galindo, Kameron	\$25,000.00
Garcia, Ricardo Licona	\$219.55
Gardner, Travis	\$500,000.00
Garvin, Nathan	\$9,326.34
Gentry, Dylan Lee	\$3,500.00
Gershon, Ben	\$25,000.00
Ghobrial, Mark	\$5,168.52
Gil, Jose	\$25,000.00
Giles, Dangelo	\$7,000.71
Glasson, Dominic	\$520.54
Golay, Steven	\$100,000.00
Gomez, Christopher	\$4,839.27
Gonzalez, Marc Rene	\$1,553.23
Guerrero, Jesus	\$1,480,000.00
Gummow, Matt	\$5,000.00
Gutierrez, Jose	\$5,000.00
Guy, Demorrious	\$100,000.00
Guzman, Luis	\$1,000.00
Gwaltney, Gavin	\$25,000.00
Ha, Lance	\$25,000.00
Haddad, Yazen	\$25,000.00
Hall, Jermal	\$25,000.00
Ham, Jae	\$12,400.00
Haro, Jeffrey	\$25,000.00

Harris, Scott	\$1,800.54
Harris, Tommy	\$25,000.00
Hash, Timothy	\$500,000.00
Hawkins, Ariel	\$18,000.00
Henry, Josiah	\$1,300.00
Her, Chaming	\$1,148.51
Heredia, Luis	\$25,000.00
Hernandez, Pedro	\$25,000.00
Herrera, Diana	\$25,000.00
Higashino, James	\$25,000.00
Householder, Nicholas	\$5,005.04
Howard, Michael	\$25,000.00
Hubbard, Samuel	\$25,000.00
Hughes, Alexander	\$25,000.00
Humphrey, David	\$2,000.00
Hurlock, Omar	\$1,000.00
Hurtado, Marco	\$1,000.00
Irwin, Eric	\$25,000.00
Ishola, Saeed	\$100,000.00
Jacobs, Angel	\$25,000.00
Jacques, Seth Louis	\$25,000.00
Jensen, Jon	\$5,888.00
Jones, Guy	\$10,000.00
Jones, Kenneth	\$100,000.00
Justiniano, Edwin	\$25,000.00
Kabinga, Kay	\$135,000.00
Kalil, Kristian	\$24,572.70
Kalyana, Surya	\$2,703.09
Kamiksisian, Harout	\$2,681.49
Karney, Patrick Franklin	\$1,254.41
Keidel, Patrick	\$25,000.00
Kenna, John L.	\$70,961.71
Kevin Brandon Keoki Bridges	\$500,000.00
Khachadour, Leon	\$476.43
King, Wahaj	\$25,000.00
Knight, Brandon	\$25,000.00
Knowles, Philip	\$10,000.00
Knox, Lquil	\$25,000.00
Kolodziejski, Chet	\$25,000.00
Koran, Michael	\$5,000.00
Kushell, Yiannis	\$1,739.26

LaPuma, Frank	\$2,905.40
Lasalandra, Vito	\$100,000.00
Lee, Joe	\$1,046.16
Lee, Murray	\$5,000.00
Lester, Jeffrey	\$10,000.00
Lewis, Kristofor	\$1,733.20
Liebenauer, Eric	\$29,630.45
Longval, Matthew	\$22,095.38
Lopin, Eugene	\$25,002.01
Louis, Zane	\$499.91
Ma, Kelvin	\$8,384.23
Maldonado, Pablo	\$25,000.00
Manougian, Edward	\$3,975.50
Marble, Kevin	\$25,000.00
Marcu, Joshua	\$3,497.74
Margolis, Daniel Everette	\$25,000.00
Marra, Marc	\$10,405.50
Martinez, John Paul	\$25,000.00
Mata, Mark	\$5,000.00
McClure, Thomas	\$25,000.00
Mcdaniel, Edward Joshua	\$25,000.00
McIntyre, Austin	\$2,000.00
Mclain, Ryan	\$25,000.00
Mclaughlin, Ryan	\$25,000.00
McNamara, Jay	\$5,000.00
Mecklenburg, William	\$1,000.00
Meehan, Ryan	\$1,954.79
Metcalf, Stephen	\$25,000.00
Miller, Justin	\$25,000.00
Mirzaei, Kaveh	\$25,000.00
Molina, Cameron	\$25,000.00
Moore, Sinjin	\$5,000.00
Morales, Carlos	\$500,000.00
Moreno, Orlando	\$100,000.00
Moroian, Eduardo	\$10,000.00
Motta, Aaron	\$25,000.00
Mulu, Tsega	\$25,000.00
Muntaser, Fady	\$25,000.00
Myers, Justin	\$25,000.00
Myszka, Tyler Austin	\$864.75
Navarro, Dilan	\$25,000.00

Nemer-Kaiser, Brian	\$25,000.00
Nguyen, Huy	\$60,000.00
Nichols, John	\$25,000.00
Nieters, Ty	\$2,393.10
Noren, Zac	\$25,000.00
Nystrom, Trevor Lee	\$100,000.00
Olsen, Andreas	\$5,290.75
Omobhude, Ehis	\$25,000.00
Ortikov, Sanjar	\$25,000.00
Ostorga, Paulino	\$500,000.00
Padacheril, Sunil	\$25,000.00
Padilla, Mark	\$25,000.00
Padilla, Wilmar	\$25,000.00
Pajares, Julber	\$13,192.07
Pal, Leslie Powellcraft	\$500,000.00
Palazzo, Brian	\$25,000.00
Palomba, Mark David	\$500,000.00
Papoulis, John	\$100,000.00
Parshall, Joel	\$5,000.00
Passariello, Salomon	\$25,000.00
Patel, Mihir	\$25,000.00
Patrick, Ryan	\$25,000.00
Paulson, Cody	\$25,000.00
Perez, Pedro	\$2,952.86
Pichardo, Jose	\$2,000.00
Pieper, Avery	\$5,765.21
Pigurina, Juan Antonio	\$25,000.00
Pizzoferrato, Joseph	\$25,000.00
Plowden, David	\$1,191.31
Plummer, Nicholas	\$25,000.00
Pop, Silvio	\$8,000.00
Powers, Michael	\$25,000.00
Prince, Shawn	\$25,000.00
Pursley, Tanner Kye	\$25,000.00
Race, Thompson	\$25,000.00
Rajjoub, Alex	\$25,000.00
Ramlackhan, Rohan	\$25,000.00
Rancel, Alexander	\$2,679.52
Randolph, Carter	\$4,000.00
Reyes, Ramon	\$1,260.00
Richardson III, Anthony A	\$25,000.00

Richter, Jibreel	\$25,000.00
Rivera, Luis Enrique Alvelo	\$1,611.45
Robertson, Jeremy	\$15,000.00
Robinson, Matthew	\$25,000.00
Rocco, Chase	\$2,400.00
Rodriguez-Novas Catala, Manuel	\$869.38
Romero, Juan	\$5,000.00
Roosta, Hootan	\$5,000.00
Roper, Phillip	\$25,000.00
Rubio, Wilber	\$1,747.98
Ruffins, Dustin	\$25,000.00
Russell, Zechariah	\$500,000.00
Russo, Asten	\$4,600.00
Sagastizado, Santos Antonio	\$25,000.00
Sale, Kenny	\$25,000.00
Sanchez, Eddys	\$23,700.00
Santoro, Phil	\$72,500.00
Sarmini, Bilal Mahmoud	\$25,000.00
Saxon, Daelon	\$2,795.00
Schantz, Christian Thomas	\$25,000.00
Schilling, Kristopher	\$100,000.00
Schleicher, Tyler	\$25,000.00
Schmidt, Peter	\$25,000.00
Schoonmaker, Tristan William	\$25,000.00
Schroeder, Jeffery	\$25,000.00
Scott, Derrick	\$500,000.00
Serajian, Vahid	\$3,025.12
Shadis, Jesse	\$25,000.00
Shapiro, Matthew	\$28,327.68
Sharif, Gabriele	\$5,657.15
Shbib, Basel	\$25,000.00
Sheetz, Adam	\$10,000.00
Shuvo, Md nasirul	\$500,000.00
Smith, Bradon Matthew	\$25,000.00
Smith, Christopher	\$2,000.00
Smith, Joshua	\$25,000.00
Sotillet Rojas, Luis	\$25,000.00
Spann, Nicholas	\$25,000.00
Spittle, James	\$5,000.00
Squitieri, Nicholas	\$557.32
Srungavarapu, Pruthvi	\$25,000.00

Stamps, John	\$25,000.00
Staniscia, Corey	\$10,000.08
Steidley, Brandon	\$25,000.00
Stellwagen, Henry	\$3,130.21
Stuftt, Michael	\$25,000.00
Stutts, Michael	\$25,000.00
Swift, Rickey	\$25,000.00
Swithenbank, Nicholas	\$25,000.00
Switzer, Bruce	\$4,744.93
Taylor, Leroi Pierre	\$100,000.00
Taylor, Paul	\$25,000.00
Taylor, Zachary	\$25,000.00
Thomas, Derrick	\$25,000.00
Tlustek, Sam	\$25,000.00
Todisco, Spencer	\$25,000.00
Torres, Brent	\$20,174.59
Totten, Kevin	\$25,000.00
Tramblay, Alec	\$25,000.00
Uddin, Syed Zaki	\$25,000.00
Valero, Rene III	\$25,000.00
Vandermolen, Tyler P.	\$25,000.00
Vanegas, Justin	\$15,000.00
Viciedo, Amaury A.	\$25,000.00
Vogel, Michael	\$4,002.02
Wagner, Parker	\$2,712.86
Waters, Dominic	\$25,000.00
Wells, Damian	\$50,000.00
White, Courtney	\$25,000.00
Wilson, David	\$25,000.00
Woodruff, Nick	\$25,000.00
Woods, Craig	\$100,000.00
Worgull, Dawson	\$2,248.93
Wright, Daniel Spike	\$25,000.00
Yanez, Diego	\$2,490.45
Young, Karyn	\$130,000
Yates, Masen	\$2,316.12
Zhu, Chenxi	\$25,000.00
Zori, Facundo	\$20,000.00